

Nicholas H. Carter, Esq.
Stephanie M. Humphrey, Esq.
The Nick Carter Law Firm, P.C.
310 South Gillette Ave., Suite B
P.O. Box 909
Gillette, WY 82717-0909
(307) 682-9349
(307) 687-7690 - Fax

**IN THE UNITED STATES DISTRICT COURT,
FOR THE DISTRICT OF WYOMING**

RUDOLF DEHAAN,

Plaintiff,

vs.

Civil Case No. 07-CV-0257-J

**PERRY ROCKVAM, individually and as
representative for CODY POLICE
DEPARTMENT, and CODY POLICE
DEPARTMENT, and SCOTT A. STEWARD,
individually and as representative for PARK
COUNTY SHERIFF'S DEPARTMENT AND
DETENTION CENTER, and PARK COUNTY
SHERIFF'S OFFICE AND DETENTION
CENTER, and OFFICER TORIN
CHAMBERS, and JOHN DOES #1-#6,**

Defendants.

**PLAINTIFF'S REQUEST FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

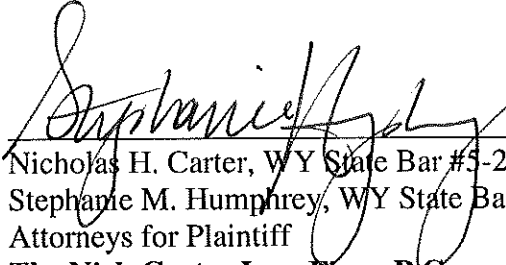
Plaintiff, Rudolf Dehaan, by and through his attorneys, Nicholas H. Carter and Stephanie M. Humphrey, The Nick Carter Law Firm, P.C., hereby respectfully requests an extension to the Court's

June 30, 2008, deadline to file a response to Defendant's Motion for Summary Judgment for the following reasons:

1. Plaintiff has filed for Relief to Amend the Complaint in this matter.
2. Defendants have objected to that Amendment.
3. Should the Court deny Plaintiff's Request for the Amendment, then many of the issues in the Defendant's Motion for Summary Judgment are no longer at issue.
4. Further, Plaintiff has determined, during discovery that the individual first named in the Complaint, Officer Torin Chambers, was not present at the time of the arrest of the Plaintiff.
5. Should the Court deny the Plaintiff's request to Amend the Complaint to reflect the other Officers that were present at the arrest of Plaintiff to Officers Beck and Stafford, then Plaintiff's response to Summary Judgment will be dependent upon that ruling.
6. Plaintiff's counsel has contacted Ms. Christine Cox at the Attorney General's Office and she does not have an objection to an extension.

7. Plaintiff's counsel has contact Mr. Richard Rideout at his office and he does not have an objection to an extension.

Respectfully submitted this 24th day of June, 2008.



Nicholas H. Carter, WY State Bar #5-2742
Stephanie M. Humphrey, WY State Bar #6-3865
Attorneys for Plaintiff
The Nick Carter Law Firm, P.C.
310 South Gillette Avenue, Suite B
Post Office Box 909
Gillette, Wyoming 82717-0909
Telephone: (307) 682-9349
Facsimile: (307) 687-7690
E-mail: attorneys@nickcarterlaw.net

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of June, 2008, the foregoing Plaintiff's Proposed Stipulations to Facts were sent to the following individuals via email:

Bruce A. Salzburg
Attorney General

E-mail @ attorneygeneral.state.wy.us.

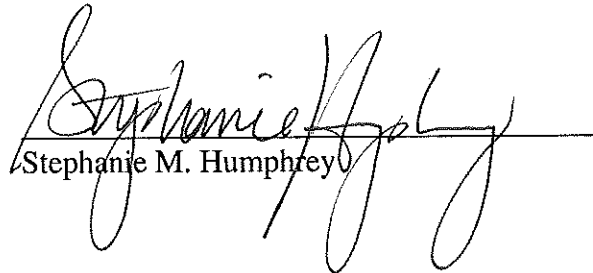
John W. Renneisen
Deputy Attorney General

Christine Cox
Senior Assistant Attorney General
Herschler Building, First Floor West
Cheyenne, WY 82002

ccox1@state.wy.us

Richard Rideout
Law Offices of Richard Rideout
P.O. Box 389
Cheyenne, WY 82003-0389

E-mail @ rsrideout@qwest.net


Stephanie M. Humphrey